

**Commonwealth of Kentucky
Division for Air Quality**

PERMIT APPLICATION SUMMARY FORM

Completed by: Sajjad Quabili

GENERAL INFORMATION:

Name:	Benson International, Inc.
Address:	489 International Drive Cadiz, KY 42211
Date application received:	12/11/2006
SIC Code/SIC description:	3715, Truck Trailers
Source ID:	21-221-00014
Source A.I. #:	74766
Activity ID:	APE20060001
Permit:	F-07-020

APPLICATION TYPE/PERMIT ACTIVITY:

<input checked="" type="checkbox"/> [X] Initial issuance	<input type="checkbox"/> [] General permit
<input type="checkbox"/> [] Permit modification	<input checked="" type="checkbox"/> [X] Conditional major
<input type="checkbox"/> [] Administrative	<input type="checkbox"/> [] Title V
<input type="checkbox"/> [] Minor	<input type="checkbox"/> [] Synthetic minor
<input type="checkbox"/> [] Significant	<input type="checkbox"/> [] Operating
<input type="checkbox"/> [] Permit renewal	<input checked="" type="checkbox"/> [X] Construction/operating

COMPLIANCE SUMMARY:

<input type="checkbox"/> [] Source is out of compliance	<input type="checkbox"/> [] Compliance schedule included
<input type="checkbox"/> [] Compliance certification signed	

APPLICABLE REQUIREMENTS LIST:

<input type="checkbox"/> [] NSR	<input type="checkbox"/> [] NSPS	<input checked="" type="checkbox"/> [X] SIP
<input type="checkbox"/> [] PSD	<input type="checkbox"/> [] NESHAPS	<input type="checkbox"/> [] Other
<input type="checkbox"/> [] Netted out of PSD/NSR	<input type="checkbox"/> [] Not major modification per 401 KAR 51:001, 1(116)(b)	

MISCELLANEOUS:

- ☐ [] Acid rain source
- ☐ [] Source subject to 112(r)
- ☒ [X] Source applied for federally enforceable emissions cap
- ☐ [] Source provided terms for alternative operating scenarios
- ☐ [] Source subject to a MACT standard
- ☐ [] Source requested case-by-case 112(g) or (j) determination
- ☐ [] Application proposes new control technology
- ☒ [X] Certified by responsible official
- ☐ [] Diagrams or drawings included
- ☐ [] Confidential business information (CBI) submitted in application
- ☐ [] Pollution Prevention Measures
- ☐ [] Area is non-attainment (list pollutants):

EMISSIONS SUMMARY:

Pollutant	Actual (tpy)	Potential (tpy)
PM/PM ₁₀	NA	12.91
VOC	NA	60*
Single HAPs		
Methyl isobutyl ketone	NA	4.03
Glycol ethers	NA	1.25
Source wide HAPs	NA	5.27

* VOC emission cap 60 tons per year

SOURCE DESCRIPTION:

Benson operates an aluminum trailer manufacturing facility in Trigg County, Kentucky. The source applied to the Division to construct a steel truck trailer plant. The process includes assembly of metal pieces, welding, grinding, grit blasting and painting. Currently, Benson is a registered source.

COMMENTS:

The Division found that Benson is potentially a major source for VOC emissions. Benson accepted voluntarily a cap on VOC emissions to become a conditional major source. The source wide allowable VOC emission limit is no greater than 60 tons per year. No control equipment is utilized for VOC emissions. Exhaust filters are utilized to control particulate matter.

Emission Point 04:

Small steel parts for the aluminum trailers are painted with "Direct to Metal Black Paint". No primer is necessary for this type of paint. About 95 % of the trailers will have black finish and the remaining 5% of the trailers will have custom requested special color. This booth consists of two applicators with a capacity of 5.6 gallons per hour, each.

Emission Point 09:

For the coating operation, all the truck bodies are painted with primer and followed by color coat. After the prime coat is dried, most of the truck bodies (approximately 95%) will be painted black with the remaining 5% will be painted other special colors. This booth consists of two applicators with a capacity of 10 gallons per hour, each.

Applicable regulation:

Regulation 401 KAR 59:010, New process operations, will apply to both emission points EP 04 and EP 09 since the affected facilities commenced after July 2, 1975.

EMISSION AND OPERATING CAPS DESCRIPTION:

Benson shall keep source wide emissions of VOCs no greater than 60 tons during any consecutive 12 month period.

PERIODIC MONITORING:

Benson will keep records of all primers, top coats, thinners, and clean-up solutions used, including the type, amount, VOC content by weight percent, less any water and/or exempt solvent. The permittee will also calculate 12-month rolling total for VOC emissions every month.